

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

*Plaintiffs,*

v.

TEXAS, et al.,

*Defendants.*

Civil Action No. 5:21-cv-844(XR)  
(Consolidated Case)

OCA-GREATER HOUSTON, LEAGUE  
OF WOMEN VOTERS OF TEXAS,  
REVUP-TEXAS, TEXAS  
ORGANIZING PROJECT, and  
WORKERS DEFENSE ACTION FUND,

*Plaintiffs,*

v.

TEXAS SECRETARY OF STATE JOHN  
SCOTT, *in his official capacity*, TEXAS  
ATTORNEY GENERAL KEN  
PAXTON, *in his official capacity*,  
HARRIS COUNTY ELECTIONS  
ADMINISTRATOR ISABEL  
LONGORIA, *in her official capacity*,  
TRAVIS COUNTY CLERK DANA  
DEBEAUVOIR, *in her official capacity*,  
HARRIS COUNTY DISTRICT  
ATTORNEY KIM OGG, *in her official  
capacity*, TRAVIS COUNTY DISTRICT  
ATTORNEY JOSÉ GARZA, *in his  
official capacity*;

*Defendants.*

1:21-cv-0780-XR

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR PLAINTIFFS' RESPONSE TO  
DEFENDANT HARRIS COUNTY DISTRICT ATTORNEY KIM OGG, IN HER  
OFFICIAL CAPACITY'S, MOTION TO DISMISS**

TO THE HONORABLE XAVIER RODRIGUEZ, U.S. DISTRICT JUDGE:

1. On March 29, 2022, Defendant Harris County District Attorney Kim Ogg, in her official capacity, filed a motion to dismiss the claims brought against her by OCA-Greater Houston, League of Women Voters of Texas, REVUP–Texas, Texas Organizing Project, and Workers Defense Action Fund (“the OCA-GH Plaintiffs”) in consolidated case 1:21-cv-0780-XR. Dkt. 344. The OCA-GH Plaintiffs’ response is due on April 12, 2022. *See* W.D. Texas Local Rule CV-7.D.2.
2. The OCA-GH Plaintiffs respectfully request the Court extend their deadline to respond to Defendant Kim Ogg’s motion by one week, from April 12, 2022, to April 19, 2022.
3. This request is sought in good faith and not for the purpose of delay. Extensive and consolidated written discovery and depositions are currently ongoing in this case, and lead counsel for the OCA-GH Plaintiffs must attend an unavoidable work function for most of the next week.
4. Defendant Kim Ogg will not be prejudiced by this extension. Counsel for the OCA-GH Plaintiffs conferred with counsel for Defendant Kim Ogg via e-mail on April 2, 2022, and Defendant Kim Ogg does not oppose this motion.
5. Accordingly, the OCA-GH Plaintiffs respectfully request the Court grant their request to extend the deadline for their response to Defendant Kim Ogg’s motion to dismiss to April 19, 2022.

Dated: April 2, 2022.

Respectfully submitted,

/s/ Zachary Dolling

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### **CERTIFICATE OF SERVICE**

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on April 2, 2022, through the Electronic Case File System of the Western District of Texas.

/s/ Zachary Dolling

### **CERTIFICATE OF CONFERENCE**

I certify that on April 2, 2022, the OCA-GH Plaintiffs' counsel conferred via e-mail with Eric J.R. Nichols, counsel for Defendant Harris County District Attorney Kim Ogg, in her official capacity, and she is not opposed to the extension requested here.

/s/ Zachary Dolling